

UNSEALED

3/3/17

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

CORPUS CHRISTI DIVISION

Clerk, U.S. District Court
Southern District of Texas
FILED

MAR 8 2017

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

v.

MONICA ROCA-PEREZ

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SEALED

CRIMINAL NUMBER

C-17-146

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Between on or about October 1, 2008, and up to and including the date of this indictment, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

and MONICA ROCA-PEREZ,

did knowingly and intentionally conspire and agree, with each other and with other persons known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Section 1956(h), to-wit: to transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds involving the proceeds of specified unlawful activity, to wit: wire fraud and unlicensed money transmitting business, from a place in the United States to or through a place outside the United States, knowing that the monetary instruments and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity, to wit: wire fraud and unlicensed money transmitting business, and knowing that such transportation, transmission, and transfer was

designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(2)(B)(i) and (h).

NOTICE OF CRIMINAL FORFEITURE

18 U.S.C. § 982(a)(1)

Pursuant to Title 18, United States Code, Section 982(a)(1) and 982(a)(2), the United States of America gives notice to the defendants,

MONICA ROCA-PEREZ,

that, upon conviction of an offense in violation of Title 18, United States Code, Section 1956 as charged in Count One of the Indictment, the United States of America shall forfeit any property, real or personal, involved in such offense, or any property traceable to such property and any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of such violation.

The property to be forfeited includes, but is not limited to, the following:

- a. The real property and improvements located at 801 E. Francisca Ave., McAllen, Texas 78503, with a legal description of: All of Lot twenty-two (22), DEL LAGO SUBDIVISION, an Addition to the City of McAllen, Hidalgo County, Texas, according to the map recorded in Volume 46, Page 117, Map Records in the Office of the County Clerk of Hidalgo County, Texas, reference to which is here made for all purposes.; and,
- b. a personal money judgment in the amount of approximately eight-hundred thousand dollars (\$800,000.00) in United States currency.

SUBSTITUTE ASSETS

In the event the property that is subject to forfeiture, as a result of any act of omission of the defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty.

it is the intent of the United States to seek forfeiture of any other property of the defendants up to the value of such property, pursuant to Title 18, United States Code, Section 982(b)(1) incorporating Title 21, United States Code, Section 853(p).

A TRUE BILL:
ORIGINAL SIGNATURE ON FILE
FOREPERSON OF THE GRAND JURY

KENNETH MAGIDSON
UNITED STATES ATTORNEY

By:


JULIE K. HAMPTON
Assistant United States Attorney